

FILED  
U.S. DISTRICT COURT  
DISTRICT OF COLUMBIA  
FOR THE DISTRICT OF MARYLAND

2012 APR 30 AM 9:42

Tania Baker

\* CLERK'S OFFICE  
AT BALTIMORE

1010 W. Balto St., apt  
224

BY KHO DEPUTY

Baltimore, md, 21223-2585  
(Full name and address of the plaintiff)

Plaintiff(s)

vs.

Wiley Medical Center

Civil No.: CCB 12 CV 1309

(Leave blank. To be filled in by Court.)

301 St. Paul Place

\*

Baltimore, MD 21202

\*

Kevin Babb, Eric Davison, P.A.C.

\*

Ari Kestler

(Full name and address of the defendant(s))

Defendant(s)

\*\*\*\*\*

COMPLAINT

1. Jurisdiction in this case is based on:

- Diversity (none of the defendants are residents of the state where plaintiff is a resident)
- Federal question (suit is based upon a federal statute or provision of the United States Constitution)
- Other (explain) amount of my surgery amounting to at least \$ 50,000 if not more. It is a guess as to price estimate and for that purpose alone .

2. The facts of this case are:

that pharyngitis and pharyngonasal conditions were carelessly ignored.

pharyngitis can be life threatening left untreated as noted in my attached complaint.

Not to mention it's effect on my type 2 diabetes control and management. My death could've resulted as a result of their intended neglect and Carelessness.

Sincerely,

Tonia Baker

3. The relief I want the court to order is:

- Damages in the amount of: \$50,000 or more to cover my surgery
- An injunction ordering: that these negligent employees be  
Court ordered to pay for my surgery -
- Other (explain) and that those negligent employees be  
Court ordered to pay for it .

4/30/12  
(Date)

Tania Baker  
(Signature)

1010 W. Belto, St. apt 224

Balto md. 21223-2585

(443) 600-3445.

(Printed name, address and phone number of Plaintiff)

#### Privacy Rules and Judicial Conference Privacy Policy

Under the E-Government Act and Judicial Conference policy, any paper filed with the court should not contain an individual's social security number, full birth date, or home address; the full name of person known to be a minor; or a complete financial account number. These rules address the privacy concerns resulting from public access to electronic case files.

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BALTIMORE

DEPT#

I, Tonia Battle am filing and pursuing  
Criminal Negligence lawsuit proceeding  
against Mercy Medical Center for the following  
medical conditions which were maliciously  
and ignorantly ignored:

pharyngitis - inflammation of the mucous  
membrane of the throat also known as pharynx  
Sore throat swelling which almost has my  
throat swollen shut. My pharynx which is the  
cavity at the back of the mouth where the passages  
of the nose, lungs, and stomach begin therefore  
life threatening conditions can and do often exist  
in other cases scenarios.

pharyngeal tonsils - inflammation of mucous  
membrane in children as well as adults known  
as adenoids. Abnormal enlargement of tonsils  
a mass of lymphoid glandular tissue at the  
back of the (throat) pharynx.

pharyngeal nasal - having to do with the  
pharynx and the nose. (Both)

nasal congestion in children as well as adults  
has caused chronic sleep apnea with insufficient  
oxygen levels. (hypoxemia)

hypoxemia - a low or deficient oxygen level in  
the blood which leads to heart attack or stroke.

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as a result of such patient malpractice neglect a death could've and would've resulted therefore in my complaint I am requesting the following relief:

- 1) that surgery be scheduled as well as conducted by licensed qualified practitioner(s) on their grounds meaning hospital or I can and will be transferred as well as ambulanced to another facility with full medical assistance coverage under my Maryland Physician's Care as supported by hospital policy.
- 2) That I be compensated in the amount of my surgery by the neglectful physicians at Mercy Medical Center and chief of staff allowing this discrimination to have taken place on their hospital grounds.
- 3) That those employees be expected to attend patient neglect meetings in a means of prevention there of further lawsuits taking place as a result.
- 4) That those neglectful employees be expected to receive a pay cut as a result of their patient neglect practices.
- 5) That all relief be deemed hopefully and considerably reasonable under the laws of this state

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(6) I did not ask for employee firings out of compassionate kindness because of course I know they have families to care for as well as I do.

7) My surgery should and could amount to at least 50,000 if not more and of course I am guessing just for estimate purposes.

Thank you most kindly  
and sincerely,

Tania Baker